

April 1, 2021

VIA ECF

Hon. Nicholas G. Garaufis
U.S. District Court - E.D.N.Y.
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Thorne, et al. v. Square, Inc. et al.*
Index: 1:20-cv-05119-NGG-RML

Your Honor:

My firm is co-counsel to Plaintiffs in the above-referenced proposed class action, brought pursuant to the Electronic Funds Transfer Act, 15 U.S.C. § 1693, *et seq* and state laws. I write on consent of all parties to request a brief adjournment of the pre-motion conference currently scheduled for this coming Monday, April 5, 2021. The reason for the request is that the attorney who was scheduled to argue on behalf of Plaintiffs has unfortunately taken ill (with Covid).

This is a first request for adjournment. All parties consent. The parties are all available on:

- April 19 (anytime prior to 3 PM, EST),
- April 20 (anytime after 12 PM, EST)
- April 23 (anytime)

I thank the Court for its consideration of this request.

Respectfully,
/s/Daniel A. Schlanger
Daniel A. Schlanger

cc: all counsel of record